

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE**

**BLOUNT PRIDE, INC., a 501(c)3  
nonprofit organization, and  
MATTHEW LOVEGOOD,**

*Plaintiffs,*

v.

**RYAN K. DESMOND, in his  
individual and official capacity as  
the District Attorney General of  
Blount County, Tennessee;  
JAMES BERRONG, in his official  
capacity as Blount County Sheriff;  
TONY CRISP, in his official  
capacity as Alcoa Police Chief;  
and JONATHAN SKRMETTI, in  
his official capacity as Attorney  
General of Tennessee,**

*Defendants.*

**Civil No. 3:23-cv-00316-JRG-JEM**

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**DECLARATION OF J. MATTHEW RICE IN SUPPORT OF  
DISTRICT ATTORNEY RYAN DESMOND’S RESPONSE IN OPPOSITION  
TO PLAINTIFF’S MOTION FOR A TEMPORARY RESTRAINING ORDER**

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I, J. Matthew Rice, declare as follows pursuant to 28 U.S.C. § 1746:

1. I am an adult over eighteen years of age. I am an attorney with the Office of the Tennessee Attorney General, counsel of record for Defendant Ryan K. Desmond in his official capacity as District Attorney General of the Fifth Judicial District in the above-captioned actions. I am duly licensed to practice law in the State of Tennessee, and am admitted to the bar of this Court.

2. I submit this declaration in support of for Defendant Ryan K. Desmond in his official capacity, based on my own personal knowledge and if called to testify as to the truth of the matters herein, I could and would competently testify.

3. Attached as Exhibit 1 is a true and correct copy of the transcript of the legislative hearings for the Adult Entertainment Act transcribed for and previously filed in *Friends of Georges, Inc. v. Mulroy*, No. 2:23-cv-2163 (W.D. Tenn. Apr. 14, 2023), ECF No. 35-1

4. Attached as Exhibit 2 is a true and correct copy of Public Chapter No. 2 § 3, 113th General Assembly (2023), which enacted the Adult Entertainment Act.

5. Attached as Exhibit 3 is a true and correct copy of 1990 Tenn. Pub. Acts 938, ch. 1092, §§ 1-3.

6. Attached as Exhibit 4 is a true and correct copy of 1987 Tenn. Pub. Acts 841, ch. 432, § 2.

7. Attached as Exhibit 5 is a true and correct copy of a Facebook entry on the Facebook page for Blount Pride, dated February 10, 2023. This webpage is available at <https://www.facebook.com/blountpride/> and was visited on August 30, 2023.

8. Attached as Exhibit 6 is a true and correct copy of a Facebook entry on the Facebook page for Blount Pride, dated June 11, 2023. This webpage is available at <https://www.facebook.com/blountpride/> and was visited on August 30, 2023.

9. Attached as Exhibit 7 is a true and correct copy of a New York Times article by Emily Cochrane, titled *Judge Finds Tennessee Law Aimed at Restricting Drag Shows Unconstitutional*, and dated June 3, 2023. This article is available at <https://www.nytimes.com/2023/06/03/us/politics/tennessee-drag-ruling.html> and was visited on August 30, 2023.

s/ J. Matthew Rice

J. MATTHEW RICE (BPR #040032)

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